

SADMIRA RAMIC, ESQ.
Nevada Bar No.: 15984
CHRISTOPHER M. PETERSON, ESQ.
Nevada Bar No.: 13932
SOPHIA A. ROMERO, ESQ.
Nevada Bar No.: 12446
**AMERICAN CIVIL LIBERTIES
UNION OF NEVADA**
601 South Rancho Drive, Suite B-11
Las Vegas, NV 89106
Telephone: (702) 366-1226
Facsimile: (702) 830-9205
Email: ramic@aclunv.org
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT COURT OF NEVADA

DAWNYELL FLYNN, an individual,

Plaintiff,

vs.

STATE OF NEVADA ex rel. NEVADA
DEPARTMENT OF CORRECTIONS, a
public entity of the State of Nevada; DONALD
BURSE, an individual; CHARLES DANIELS,
director, in his official capacity; GABRIELA
NAJERA, warden, in her official capacity;
KARISSA CURRIER, associate warden, in her
official capacity; MONIQUE HUBBARD-
PICKETT, associate warden, in her official
capacity; and Doe Nevada Department of
Corrections Employees 1 – 10, in their
individual and official capacity,

Defendant(s).

Case Number:

2:22-cv-01753-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO DEFENDANTS' MOTION TO
DISMISS AND TO FILE A
DISCOVERY PLAN**

ECF Nos. 7, 9

STIPULATION

(FIRST REQUEST)

Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, it is hereby stipulated and agreed by and among Defendants, Nevada Department of Corrections (NDOC) and Charles Daniels, and Plaintiff, Dawnyell Flynn, as follows:

1. Defendants, NDOC and Charles Daniels, removed this action from state court to federal court on October 19, 2022. *See* ECF No. 1.

2. Defendants filed a Motion to Dismiss on December 30, 2022. *See* ECF No. 7.

3. Defendant Donald Burse has not made an appearance.

4. The Court issued an order on December 30, 2022, ordering Plaintiff to respond by January 13, 2023.

5. The Court issued an order on December 30, 2022, setting a deadline of January 29, 2023, for a Discovery Plan/Schedule.

6. On January 12, 2023, counsel for Defendants NDOC and Charles Daniels and counsel for Plaintiff conferred regarding potential settlement in this matter.

7. Settlement negotiations are ongoing.

8. The deadline to file an opposition in response to the Motion to Dismiss shall be extended 60 days. The new deadline is March 13, 2023.

9. The deadline to file a Discovery Plan/Schedule shall be extended 60 days. The new deadline is March 30, 2023.

10. This is the parties' first request for an extension of any deadline in this case. The requested extension is not intended to cause any delay or to prejudice any party.

1 AMERICAN CIVIL LIBERTIES UNION OF
2 NEVADA

3 By: /s/ Sadmira Ramic
4 SADMIRA RAMIC, ESQ.
5 Nevada Bar No. 15984
6 601 South Rancho Drive, Suite B-11
7 Las Vegas, NV 89106
8 *Attorney for Plaintiff*

OFFICE OF THE ATTORNEY GENERAL

By: /s/ Craig A. Newby
CRAIG A. NEWBY, ESQ.
Nevada Bar No. 8591
555 E. Washington Ave., Ste. 3900 Las
Vegas, Nevada 89101
Attorney for NDOC and Charles Daniels

ORDER

IT IS SO ORDERED.

9 
10 U.S. DISTRICT COURT JUDGE

11 DATED: 1-18-23
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